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8 *Counsel for Lead Plaintiff and the Class*

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

11 In re Silver Wheaton Corp.  
12 Securities Litigation

13 Master File No. 2:15-cv-05146-  
14 CAS(JEMx)  
15 c/w: 2:15-cv-05173-CAS(JEMx)

16 CLASS ACTION

17 DISCOVERY MATTER

18 **REPLY DECLARATION OF**  
19 **JONATHAN HORNE**

20 JUDGE: Hon. John E. McDermott

21 Hearing Date: March 14, 2017

22 Time: 10:00 a.m.

23 Complaint Filed: July 8, 2015

24 Discovery Cut-Off: December 31,  
25 2017

26 Pretrial Conference Date: None

27 Trial Date: None  
28

1 I, JONATHAN HORNE, pursuant to 28 U.S.C. § 1746, declare:

2 1. I am admitted *pro hac vice* before this Court. I am an attorney at The  
3 Rosen Law Firm, P.A., attorneys for Lead Plaintiff and Named Plaintiffs Thomas  
4 Bartsch, Larry Brandow, Diana Choi, Ben Potaracke, Jędrzej Borowczyk, and  
5 Charles Remmel (“Plaintiffs”) in this action.

6 2. I make this declaration in support of Plaintiffs’ Reply In Support of  
7 Plaintiffs’ Motion to Compel and Plaintiffs’ Reply In Support of Issuance of Letters  
8 Rogatory. I am above the age of 18 and have personal knowledge of the matters  
9 stated herein, and if called as a witness, I could and would competently testify  
10 thereto.

11 3. Attached hereto are true and correct copies of the following  
12 documents:

13  
14 Exhibit 1: An email dated December 30, 2016, addressed to  
15 undersigned counsel from John C. Roberts Jr., counsel for Defendants  
16 Silver Wheaton Corp., Randy V. J. Smallwood, Peter Barnes and Gary  
Brown (collectively, “Defendants”).

17 Exhibit 2: An email dated October 26, 2016, addressed to Diane  
18 Walters, counsel for Defendants, from undersigned counsel.

19 Exhibit 3: Defendants’ Amended Responses and Objections to  
20 Plaintiffs’ First Requests For Production of Documents to Defendants,  
21 dated November 23, 2016.

22 Exhibit 4: A letter dated December 15, 2016, addressed to counsel for  
23 Defendants Diane Walters from counsel for Plaintiffs, Laurence  
24 Rosen,

25 Exhibit 5: An email dated November 30, 2016, addressed to  
26 undersigned counsel from counsel for Defendants, Diane Walters.

27 Exhibit 6: A Letter of Request For Examination Out of the  
28 Jurisdiction, filed in the action styled as *Run Them Sweet, LLC v. CPA*



**CERTIFICATE OF SERVICE**

I, Laurence Rosen, hereby declare under penalty of perjury as follows:

I am an attorney at The Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On February 28, 2017, I electronically filed the following **REPLY DECLARATION OF JONATHAN HORNE** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on February 28, 2017.

/s/ Laurence Rosen  
Laurence Rosen